

VONAGE HOLDINGS CORP.
SECTION 64.2009(E) CERTIFICATION
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2019

Date filed: March 1, 2019

Name of company covered by this certification: Vonage Holdings Corp.

Form 499 Filer ID(s): 825971, 827095, 825993, 826278, and 826064

Name of signatory: Randy Rutherford

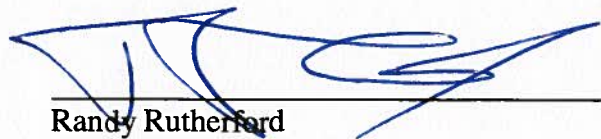
TITLE OF SIGNATORY: Chief Legal Officer

I, Randy Rutherford, a duly authorized officer of Vonage Holdings Corp., hereby certify on behalf of interconnected Voice over Internet Protocol providers Vonage America Inc. ("Vonage") and Vonage Business Inc. ("Vonage Business") all wholly owned subsidiaries of Vonage Holdings Corp., that I have personal knowledge that Vonage and Vonage Business have established operating procedures that were adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Vonage and Vonage Business have not taken any actions against data brokers in the past year. Vonage received no customer complaints in the past year concerning the unauthorized release of CPNI. Vonage Business received no complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Randy Rutherford
Chief Legal Officer
Vonage Holdings Corp.
March 1, 2019

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64 SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains how the operating procedures of Vonage America Inc. (“Vonage”) and Vonage Business Inc. (“Vonage Business”),¹ all interconnected voice over Internet protocol (“VoIP”) providers, ensured that they were in compliance with the Commission’s CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

1. Use of customer proprietary network information without customer approval.

As permitted by the CPNI rules,² Vonage and Vonage Business may use CPNI without customer approval to (1) bill and collect for services rendered; (2) protect the rights or property of Vonage and Vonage Business and other users or other carriers from unlawful use; (3) provide customer premises equipment and protocol conversion; (4) provision inside wiring, maintenance and repair services; (5) market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding and certain other Centrex features; and (6) market services among the categories of service to which the customer already subscribes from Vonage and Vonage Business.

Vonage and Vonage Business used individually identifiable CPNI for the provision of service from which the CPNI is derived to provide customer support related to such service, and to bill and collect for such service. Vonage and Vonage Business also used individually identifiable CPNI to protect its rights or property, or to protect users of its interconnected VoIP service and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services. In addition, Vonage and Vonage Business used individually identifiable CPNI to market service offerings among the categories of service to which its customers already subscribed. Vonage and Vonage Business did not use CPNI to track customers that call competing service providers.

¹ Vonage Holdings Corp. acquired interconnected VoIP provider Vocalocity, Inc. in November 2013. Vonage Holdings Corp. acquired interconnected VoIP provider Telesphere Network Ltd. in December 2014. Vonage Holdings Corp. acquired interconnected VoIP provider Simple Signal Inc. in April 2015. Vonage Holdings Corp. acquired interconnected VoIP provider iCore Networks, Inc. in September 2015. Each of these acquired entities was merged into Vonage Business Inc. with the exception of iCore, which is a wholly owned subsidiary of Vonage Business Inc. Vonage Business Inc. offers interconnected VoIP services to small and medium businesses and to larger and multi-location businesses. Vonage America, Inc., which provides Vonage residential interconnected VoIP services in the U.S., is also a wholly owned subsidiary of Vonage Holdings Corp.

² In this statement, the term customer proprietary network information or CPNI means “Customer Proprietary Network Information” as that term is defined at 47 U.S.C. § 222(h)(1).

2. Approval required and notification for use of customer proprietary network information.

As discussed above, Vonage and Vonage Business used individually identifiable CPNI to provide service, to provide support to customers of its service, to bill and collect for its service, and to market services among the categories of service to which the customer already subscribes from Vonage and Vonage Business. Vonage and Vonage Business did not use or permit the use of individually identifiable CPNI for marketing outside of the categories of service to which the customer already subscribes from Vonage and Vonage Business. As a result, Vonage and Vonage Business did not make use of individually identifiable CPNI in a way that would require notice of such use and customer approval.

3. Safeguards required for use and disclosure of customer proprietary network information.

A. Vonage

Safeguarding CPNI. For live telephonic support, a Vonage customer must provide his/her personal identification number ("PIN") to a Vonage agent and the agent must enter this PIN before the agent can access the customer's CPNI in Vonage's customer care system. In addition, a password is required for a customer to gain access to his/her CPNI information online. If the customer cannot provide his/her PIN for live telephonic support or his/her password for online account access, Vonage also has a backup authentication method. These protections are discussed in more detail below.

Additionally, the customer care related systems record how the customer was verified (e.g. by password or backup authentication if the customer forgot the password) for each call handled by an agent. The customer care systems also record any access by an agent to CPNI while the customer is not on the telephone and the reason why the agent accessed the CPNI. Vonage also maintains a log of changes to a customer's online or telephone account access passwords, backup authentication questions, email address, or physical address.

Telephone access to CPNI. All customers who purchased service over the telephone received a personal identification number ("PIN") via email. This PIN must be used by the customer to access his/her CPNI on calls into Vonage customer care. Similarly, customers who purchased service on the Vonage website are given a PIN for telephonic access to their account, as part of the subscription process.

Online access to CPNI. Vonage customers must provide a password to access CPNI online. For customers that purchased service online, establishing a password for online access is part of the subscription process. Customers who subscribe over the telephone are sent a temporary password for online access to the email address that was provided by the customer during the subscription process. The email message also instructs the customer to log on to his/her online account to personalize the password. If the customer does not log on to his/her online account and personalize his/her password within 7 days,

Vonage sends the customer an email reminder to log on and personalize his/her password.

Backup authentication. Vonage has established a backup authentication method based on user selected security questions and the customer's answer to the selected questions. These questions are not based on readily available biographical information or account information. When customers that subscribed over the telephone log on to their account for the first time, they must select their security questions and provide answers as a backup authentication method. Customers that subscribed online must select security questions and answers as part of the subscription process.

Notification of account changes. Vonage sends email notification of account changes to customers at their email address of record. Customers receive notice for changes to their password, PIN, security questions, and E911 address.

Training/Discipline. Vonage has trained its employees and personnel as to when they are and are not authorized to use or access CPNI, and the Company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Vonage, it falls within the disciplinary policy of Vonage's Information Security Policy. As such, employees are subject up to disciplinary action up to and including termination of employment if they access CPNI in a manner that is not in compliance with the FCC rules.

B. Vonage Business Cloud

Online access to CPNI. Vonage Business Cloud users must provide a password to access CPNI online. During initial user setup, a user receives a system-generated password via email for online account access. When the user first logs on the online account, the user is prompted to establish a personal password and provide answers to backup authentication questions.

The information that an individual user can view online is determined by his or her user status on the account. End Users can only view the settings and call detail records for their individual extensions. Administrators can view account payment information, past bills for the account, and call detail records for all extensions across the account. In addition, each account has one Super User. Super Users have the same access rights as Administrators but Super Users also have the ability to create or change Administrators.

Telephone access to CPNI. Vonage Business Cloud does not provide access to call detail records over the telephone. An Administrator or Super User can request call detail records over the phone but these records will only be emailed to the current email address on file for the Super User.

Backup authentication. If a user cannot remember his or her password, the online account allows the user to receive his or her password via an email to the user's email address on file when the user is able to answer one of his or her backup authentication questions. If a user contacts Vonage Business Cloud via telephone to resolve a password issue, care

agents can reset the user's password by sending an email to the user's email address on file with a system-generated password, which restarts the process described in the *Online access to CPNI* section above.

Notification of account changes. Vonage Business Cloud notifies users immediately via email of account changes such as password changes or address of record changes.

Training/Discipline. Vonage Business Cloud has trained its employees and personnel as to when they are and are not authorized to use or access CPNI, and the Company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Vonage Business, it falls within the disciplinary policy of Vonage's Information Security Policy. As such, employees are subject up to disciplinary action up to and including termination of employment if they access CPNI in a manner that is not in compliance with the FCC rules.

C. Vonage Enterprise

Online Access to CPNI. Vonage Enterprise customers must provide a password to access CPNI online.

Telephone Access to CPNI. Vonage Enterprise does not provide telephone access to call detail information. An authorized user can request call detail records over the phone but these records will only be emailed to the current email address on file for the authorized user.

Backup Authentication. Vonage Enterprise West³ allows customers to reset their online account access by correctly answering previously selected security questions.

Vonage Enterprise East customers can change their password by emailing Vonage support from the company email of record with an official request.

Notification of account changes. Vonage Enterprise West notifies customers immediately by email to the customer's email address of record or by voicemail to the telephone number of record of any changes to customer account information. This notice does not reveal the changed information and is sent to the existing address or telephone number of record, not to an address or telephone number that has been changed.

Vonage Enterprise East sends notice to the customer's address of record whenever a password, online account, or address of record is changed. The notices do not reveal the changed information.

³ Vonage Enterprise West is legacy Telesphere Network Ltd. and Simple Signal Inc. Vonage Enterprise East is legacy iCore Networks, Inc. Vonage is currently unifying and upgrading the customer CPNI experience across Vonage Enterprise. For this statement, Vonage refers to Vonage Enterprise West and East to identify where customer CPNI experience is different.

Training/Discipline. Vonage Enterprise has trained its employees and personnel as to when they are and are not authorized to use or access CPNI, and the Company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Vonage Business, it falls within the disciplinary policy of Vonage's Information Security Policy. As such, employees are subject up to disciplinary action up to and including termination of employment if they access CPNI in a manner that is not in compliance with the FCC rules.

4. Notification of CPNI Breaches.

Vonage and Vonage Business have established procedures, consistent with the Commission's CPNI rules, to notify law enforcement and customers of breaches of customers' CPNI.